

# Exhibit 2

LEGAL NOTICE

**If You Are Or Were An Owner Of Real Property In New Jersey On  
Which A Tax Sale Certificate Was Sold At A Public Auction  
Between  
January 1, 1998 And February 28, 2009**

**You May Have a Claim in Proposed Class Action Settlements  
You Are Not Being Sued.**

The Court has preliminarily approved 14 proposed settlements totaling \$8.33 million (the "Proposed Settlements"), with some, but not all, Defendants (the "Settling Defendants") in a putative class action lawsuit (the "Lawsuit") brought on behalf of certain real property owners in New Jersey who had a tax sale certificate issued with respect to their real property that was purchased by a Defendant at a public auction at an interest rate above 0% (the "Class") during January 1, 1998 through February 28, 2009 (the "Class Period"). Defendants are individuals and entities who purchased tax sale certificates ("TSCs") at public municipal auctions during the Class Period.

The Lawsuit is called *In Re New Jersey Tax Sales Certificates Antitrust Litig.*, 3:12-CV-01893-MAS-TJB, and is pending in the U.S. District Court for the District of New Jersey (the "Court"). For a complete listing of all Defendants please visit the court-approved website [www.njtaxliensettlements.com](http://www.njtaxliensettlements.com). The following is a partial list of the Defendants: 1) CCTS Capital, LLC n/k/a Crestar Capital, LLC; 2) American Tax Funding, LLC; 3) BBX Capital Corporation f/k/a BankAtlantic Bancorp, Inc., Fidelity Tax, LLC, Heartwood 55, LLC; 4) Richard Simon Trustee, Betty Simon Trustee; 5) Mooring Tax Asset Group, LLC; 6) Norman T. Remick; 7) Michael Mastellone; 8) PAM Investors; 9) Robert U. Del Vecchio Sr.; 10) CCTS, LLC, CCTS Tax Liens I, LLC, CCTS Tax Liens II, LLC, DSBID, LLC, Pro Capital LLC ("Butler and Farber Defendants"); 11) Plymouth Park Tax Services, LLC; 12) M.D. Sass Investors Services, Inc., M.D. Sass Tax Lien Management, LLC, M.D. Sass Municipal Finance Partners – I, L.P., M.D. Sass Municipal Finance Partners – II, L.P., Sass Municipal Finance Partners – III, L.P., Sass Municipal Finance Partners – IV, L.P., Sass Municipal Finance Partners – V, L.P., Sass Municipal Finance Partners – VI, L.P. ("Sass Entities"), Vinaya K. Jessani and Stephen E. Hruby (collectively with the Sass Entities, the "Sass Defendants"); 13) Robert E. Rothman; 14) Royal Bancshares of Pennsylvania, Inc., Royal Bank America, Crusader Servicing Corporation, and Royal Tax Lien Services, LLC ("Crusader Defendants"); 15) William A. Collins; 16) Isadore H. May; 17) Burlington Assembly of God/Fountain of Life Center, Mercer S.M.E., Inc. ("Mercer Defendants"); 18) Richard J. Pisciotta, Jr.; and 20) Phoenix Funding, Inc.

**What is the Lawsuit About?**

TSCs are certificates acquired by a purchaser at a public auction and represent that purchaser's right to collect a delinquent property tax or other municipal charge, including water or sewer charges, from an owner of property in New Jersey, along with associated interest and fees.

Plaintiffs allege violations of federal antitrust laws and New Jersey state antitrust, tax sale and unjust enrichment laws in connection with the purchase and sale of TSCs. Plaintiffs claim that Defendants conspired to fix, raise, maintain or stabilize the interest rates of the TSCs. Plaintiffs allege that this conspiracy resulted in overcharges to real property owners who had a TSC issued for their property and sold at auction.

Defendants have denied any liability and all allegations of misconduct. The following 14 groups of Settling Defendants have agreed to settle their cases with Plaintiffs, subject to Court approval: 1) Robert E. Rothman; 2) Richard J. Pisciotta, Jr.; 3) William A. Collins; 4) Isadore H. May; 5) Robert W. Stein; 6) Norman T. Remick; 7) Lambros Xethalis; 8) American Tax Funding; 9) Plymouth Park; 10) Phoenix Funding; 11) the Sass Defendants; 12) the Crusader Defendants; 13) the Butler and Farber Defendants; and 14) the Mercer Defendants (the "Settling Defendants"). The Court has preliminarily approved the Proposed Settlements and preliminarily certified the Settlement Class for settlement purposes only.

**Who is Included in the Proposed Class Action Settlements?**

If the Court approves the Proposed Settlements, with some exceptions, you will be included as a member of the Class if one or more of the Defendants purchased a TSC associated with your real property at a municipal auction in New Jersey at an interest rate above 0% between January 1, 1998 and February 28, 2009.

**What Do the Proposed Settlements Provide?**

The Settling Defendants have agreed to pay a total of \$8,330,000 (the "Settlement Fund") and provide cooperation to Plaintiffs. Additionally, and subject to certain exceptions, Class members who had a TSC purchased during the Class Period by a Settling Defendant, which is still held by a Settling Defendant, will be offered up to a 15% discount off of the amount owed, subject to

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**1-800-000-0000**

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certain exceptions. If you are eligible for a discount, you will be contacted separately. Copies of the Settlement Agreements, as well as a more detailed notice, are available at the website below. The detailed Notice also explains that a portion of the Settlement Fund will be used for, among other things, litigation expenses and legal fees

#### **How to Get Benefits?**

The Court will hold a hearing on [DATE] to consider whether to grant final approval of the Proposed Settlements. If you are a member of the Class and do not opt-out of the Proposed Settlements, you may be eligible to receive benefits if the Court grants final approval of the Proposed Settlements. You need not take any action at this time and the amount of your benefits will be determined at a future time by a plan of distribution, which will be posted on the website [www.njtaxliensettlements.com](http://www.njtaxliensettlements.com), and must also be approved by the Court.

#### **Your Other Rights**

If you do not want to be legally bound by one or more of the Proposed Settlements, you must “opt-out” and exclude yourself, in writing, by identifying each Proposed Settlement for which you seek exclusion. The exclusion deadline is [REDACTED]. You will be bound by the judgment of the Court regarding your claims and cannot present them in another lawsuit unless you exclude yourself as described in the detailed Notice, available at [www.njtaxliensettlements.com](http://www.njtaxliensettlements.com).

If you stay in a settlement, you may object to it by [REDACTED]. The detailed Notice explains how to object.

The Court has appointed Hagens Berman Sobol Shapiro LLP and Hausfeld LLP as Class Counsel to represent you at no charge to you. You may hire your own lawyer at your own cost.

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